

Air workshop 2006 - Comments on white papers

It is a timely effort taken by NJDEP to find ways and means to control our air pollution and preserve the health of our community. Healthy community is one of the prime requirements for economic development of New Jersey. All the sixty white papers propose ideas to control air pollution in New Jersey. The cost-benefit analyses in those papers show the burden to state, private organizations, and consumers.

When these white papers become NJ law, costs associated with air pollution reduction will be initially taken by the state and the private organizations. Sooner or later these costs will be passed on to the citizens of New Jersey unless New Jersey gets 100% reimbursement from federal government. Cost of air pollution control is a critical factor when the state takes up the issue of how best to implement the standards and restore healthy air for our citizens. Generally, air quality standards have always been met with claims of short term economic fall. Then new technologies catch up and innovative programs are implemented to clean the air.

In the present economic and financial situation faced by New Jersey, it would be better if NJDEP recommends to the law makers a collection of white papers that gives maximum benefits to the state with minimum costs to the citizens. The NJDEP will assess the effects of the proposed regulatory and other actions on state and local governments, and private sectors. A master chart showing costs to state and consumer, and benefits in three separate columns for the recommended white papers would help the decision-makers to make appropriate decisions on the selected white papers. The recommendation will have supporting documents to show that substantial net economic benefits to society are achieved due to reduction in emissions. The recommendation package will show that the selected white papers would be highly beneficial to society. The master chart could have separate columns showing ranking of white papers based on benefits to society, costs to public, state, and private organizations, ease of technical implementation, and ease of legal enforcement. If possible, an additional matrix showing ranking of those strategies that would make important progress in preventing death and disease from air pollution may be included in the package. If the state bears any portion of the cost of air pollution control, then a financial plan to meet that cost may be included in the recommendation package.

The recommendation package will include negative impacts, if any, and necessary mitigation measures to reduce the negative impacts. If some white papers propose mandatory requirements that harm or restrict one or two sectors of our New Jersey community, then NJDEP may explain in detail how our state would compensate the affected party when a particular white paper is selected and the mandatory requirements are enforced. For example, if public contracts enforce diesel retrofit requirements and thus eliminating small businesses from bidding, then ways and means should be recommended to compensate for not giving an opportunity for small businesses. Since New Jersey promotes small businesses, NJDEP will be required to support that certain

proposed mandatory requirements will not have significant economic impact on small entities and do not affect small businesses constitutionally.

NJDEP needs to strike a balance among various aspects of socioeconomic components, such as community health, health care costs, productivity, and the costs to control air pollution. The break-even point at which New Jersey citizens are willing to bear this additional financial burden needs to be analyzed and included in the recommendation package.

Though pollution levels have fallen since 1970, the year in which The Clean Air Act became law, public is still suffering and dying from diseases caused by air pollution. Many Americans live in areas that fail to meet at least one of the national ambient air quality standards. When New Jersey introduced new laws to clean our air, it inevitably generates a large amount of activity and attention from the public and industrialists. There may be a need to educate the public and industrialists with regard to their responsibilities and accountability to maintain clean air environment. Every one has the right to breathe clean air. It is our duty to maintain clean air in a spirit of stewardship and trusteeship for our future generations without affecting our current lives.

The Clean Air Act is time tested in proving that cleaner, and healthier air is within our reach.